

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FELIPE JESUS MAURICIO MARROQUIN,

Petitioner,

v.

JOSEPH D. MCDONALD, Plymouth County Sheriff,
TODD M. LYONS, Acting Director Immigration and
Customs Enforcement, Boston Field Office,
MICHAEL KROL, New England Field Office
Director U.S. Immigration and Customs Enforcement,
PATRICIA HYDE, Director of the Boston Field
Office, U.S. Immigration and Customs Enforcement
and Removal Operations,
KRISTI NOEM, U.S. Secretary of Homeland
Security,
PAMELA BONDI, Attorney General of the U.S.,
DONAL TRUMP, President of the U.S.
Respondents.

CA No.: 1:25-CV-11575-DJC

**JOINT STIPULATION OF DISMISSAL WITHOUT
PREJUDICE AND WITHOUT COSTS AND INTEREST**

Pursuant to Fed. R. Civ. P. 41 (a)(1)(A)(ii) the parties move this Honorable Court to
dismiss this action without prejudice and without costs and interest.

Respectfully submitted,

PETITIONER

By his counsel,

/s/ Michael B. Kaplan

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RESPONDENTS

By their counsel,

LEAH B. FOLEY

United States Attorney

/s/ Rayford A. Farquhar

Rayford A. Farquhar

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: June 13, 2025

By: */s/ Rayford A. Farquhar*
RAYFORD A. FARQUHAR
Assistant United States Attorney

LOCAL RULE 7.1 CERTIFICATION

I, Rayford A. Farquhar, Assistant United States Attorney, herein certify that on Friday, June 13, 2025, I spoke with and corresponded with Attorney Nicole Dill of Rubin Pomerleau and she provided me with permission to file this Joint Stipulation of Dismissal without Prejudice and without Costs and Interest.

Dated: June 13, 2025

By: */s/ Rayford A. Farquhar*
RAYFORD A. FARQUHAR
Assistant United States Attorney